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18 Attorneys for Defendants, COUNTY OF RIVERSIDE; MARK HAKE, AND BRYCE  
19 HULSTROM

20 *Additional counsel on following page*

21  
22 **UNITED STATES DISTRICT COURT**  
23 **CENTRAL DISTRICT OF CALIFORNIA**  
24 **EASTERN DIVISION**  
25

26 SIGMA BETA XI, INC.; ANDREW  
27 M., by and through his next friend  
28 DENISE M., on behalf of himself and  
all others similarly situated; JACOB  
T., by and through his next friend  
HEATHER T., on behalf of himself  
and all others similarly situated; J.F.,  
by and through her next friend CINDY  
MCCONNELL, on behalf of herself  
and all others similarly situated,

Plaintiffs,

v.

COUNTY OF RIVERSIDE; MARK  
HAKE, Chief of the Riverside County  
Probation Department, in his official  
capacity; BRYCE HULSTROM, Chief  
Deputy of the Riverside County

Case No. 5:18-cv-01399-JGB-JEM

**CLASS ACTION**

**ADDENDUM TO CLASS ACTION  
SETTLEMENT AGREEMENT**

Complaint Filed: July 1, 2018  
Final Approval of Class Settlement  
Granted: June 22, 2020

Judge: Hon. Jesus G. Bernal  
Mag. Judge: John E. McDermott

1 Probation Department, in his official  
2 capacity,

3 Defendants.  
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Attorneys for Plaintiffs

**ADDENDUM TO CLASS ACTION SETTLEMENT AGREEMENT**

Pursuant to Section XX.B of the Settlement Agreement and Release (“Settlement Agreement”) in the above captioned case, this Addendum is entered into by the parties to the Settlement Agreement to modify select provisions of the Settlement Agreement as described herein. The Settlement Agreement remains in effect except to the extent it is conflict with this Addendum.

1. All terms in this Addendum have the same meanings as in the Settlement Agreement.

2. Section IV.G of the Settlement Agreement is hereby revised to include the following:

H. On December 20, 2019, the Juvenile Court for the County of Riverside in Case Number SWJ1900571 Ordered that “Any youth involved in the Youth Accountability Team (" YAT") Program and/ or any other non- court- ordered probation supervision program, who is within the jurisdiction of the juvenile court, shall be appointed counsel at no cost for purposes of the youth's involvement in the YAT Program and/ or any other non-court- ordered probation supervision program only.”

This Order became effective upon execution of the Order Granting Plaintiffs' Motion for Final Approval of Class Action Settlement in the Federal Action.

A copy of the Juvenile Court’s Order in this regard is attached hereto as Exhibit “E”.

3. Section X.D of the Settlement Agreement is hereby revised to provide as follows:

D. Within 180 days of the Effective Date of Settlement, the Probation Department shall create a mandatory training plan reflecting that all personnel assigned to administer the YAT Program or any other non-court ordered supervision program, and personnel assigned to juvenile intake functions, shall receive training in the areas of “Engaging Youth for Better Probation Outcomes” and “Advancing Probation Practice” as outlined and identified by Scott MacDonald and Naomi Goldstein. Scott MacDonald and Naomi Goldstein shall coordinate and lead the training on a yearly basis beginning in FY 2020/2021.

1  
2 4. Section X.D(2) of the Settlement Agreement is hereby revised to provide as  
3 follows:

4 (2) Initial training will commence in training year FY **2020/2021** and will  
5 consist of two eight (8) hour blocks. Scott MacDonald and Naomi Goldstein  
6 will assist the Probation Department in seeking Standards and Training for  
Corrections-certification for this instruction.

7 5. Section X.D(4) of the Settlement Agreement is hereby revised to provide as  
8 follows:

9 (4) A four-hour refresher training for each course will be held annually  
10 beginning in FYI **2021/2022** and continuing through the end of FY **2024/2025**  
11 for staff who are assigned to the YAT Program or any other non-court ordered  
supervision program, and to juvenile intake functions.

12  
13 6. Sections XIII.A(3) and (4) of the Settlement Agreement are hereby revised to  
14 provide as follows:

15 A. Within 180 days of the Effective Date of Settlement, the Probation  
Department shall:

16 (3). Identify all youth who were referred to and/or placed on a YAT  
17 contract under the jurisdiction of Welfare & Institutions Code § 602.  
18 YAT case files for such youth will be maintained or sealed in accordance  
with Welfare & Institutions Code § 781 and § 786.5.

19 (a) For the 23,717 youth the Riverside County Probation  
20 Department has deemed to have "successfully completed" the  
21 YAT Program, pursuant to Welfare & Institutions Code § 786.5,  
22 the Riverside County Probation Department shall seal the YAT  
Program case file records in its custody relating to all of the 23,717  
youth referred to, and/ or who participated in, the YAT Program.

23  
24 The Riverside County Probation Department shall also notify all  
25 public or private agencies involved in operating the YAT Program  
26 to seal the YAT Program case file records in the custody of those  
27 agencies relating to all of the 23,717 youth's referral and  
28 participation in the YAT Program in accordance with Welfare &  
Institutions Code § 786.5. These agencies shall promptly seal all  
such records in accordance thereto.

1 Pursuant to Welfare & Institutions Code § 786.5, upon such  
2 sealing of any records of these 23,717 youth, the arrest or offense  
3 giving rise to the youth's participation in the program shall be  
4 deemed not to have occurred and the youth may respond  
5 accordingly to any inquiry, application, or process in which  
6 disclosure of this information is requested or sought.

7 A copy of the Juvenile Court's Order in this regard is attached  
8 hereto as Exhibit "F". This Order became effective upon  
9 execution of the Order Granting Plaintiffs' Motion for Final  
10 Approval of Class Action Settlement in the Federal Action.

11 (b) For the approximately 2,600 records related to youth who  
12 were unsuccessful or withdrew from the YAT program, some of  
13 these youth may be eligible for record sealing under Welfare &  
14 Institutions Code § 781, after the filing of a petition, assessment  
15 by the District Attorney, and a possible Court hearing has  
16 occurred.

17 A process has been established whereby the names and  
18 information related to each of the approximately 2,600 petitions  
19 have been provided to Burns & Oblachinski, counsel retained by  
20 the County to represent the approximately 2,600 youth who were  
21 unsuccessful or withdrew from the YAT program for the purpose  
22 of possibly sealing the YAT records under Welfare & Institutions  
23 Code § 781. Burns & Oblachinski will review each matter and  
24 will file a petition for sealing of YAT records under Welfare &  
25 Institutions Code § 781 where appropriate. The petition will be  
26 reviewed by the District Attorney's office and potentially objected  
27 to. If no objection is filed, the Court may approve the sealing of  
28 the youth's specific YAT program file for which the petition was  
filed. If an objection is filed, the Court will set the matter for  
hearing.

(4) Notify all youth who were referred to and/or placed on a YAT  
contract under the jurisdiction of Welfare & Institutions Code § 601 and  
their parent or guardian that the youth continues to be eligible for  
diversion under Welfare & Institutions Code § 654. This notification  
shall be done by: (1) Amending the Final Notice of Class Settlement to  
include one sentence indicating that "All youth who were referred to  
and/or placed on a YAT contract under the jurisdiction of Welfare &



1 Institutions Code § 601 continue to be eligible for diversion under  
2 Welfare & Institutions Code § 654”; (2) Including the aforementioned  
3 provision in the Addendum to Class Action Settlement Agreement as set  
4 forth herein; (3) Posting of the Final Notice and Addendum to Class  
5 Action Settlement Agreement on the County, Probation, and Class  
6 Counsels’ websites within 7 days of the Court’s approval of the  
7 Addendum to Class Action Settlement Agreement; and (4) Distributing  
8 copies of the Final Notice and Addendum to Class Action Settlement  
9 Agreement to the Juvenile Defense Panel and the District Attorney’s  
10 Office within 7 days of the Court’s approval of the Addendum to Class  
11 Action Settlement Agreement.

12 7. Section XIV(B) of the Settlement Agreement is hereby revised to include the  
13 following:

14 (7) On December 20, 2019, the Juvenile Court for the County of Riverside in  
15 Case Number SWJ1900571 Ordered that “third-party Monitors stipulated to by  
16 the Parties shall be permitted access to the Youth Accountability Team (‘YAT’)  
17 Program case files for all youth in the YAT Program or any other non- court-  
18 ordered probation supervision program to ensure Defendants’ compliance with  
19 the Agreement, subject to the following conditions: 1) any reports prepared by  
20 the third-party Monitors shall not include any of the juveniles’ names or  
21 personally identifying information; 2) any reports prepared by the third-party  
22 Monitors shall not include any individual YAT case file, or part thereof, as an  
23 attachment, addendum or exhibit to the report, and 3) the Parties shall use the  
24 following notice which currently exists in the Notice to the Class in the Federal  
25 Action, provided to this Court, which advises Class Members that, ‘The County  
26 will regularly collect and analyze data around the referrals, participation, and  
27 outcomes for youth who are placed in the YAT program. The County will  
28 disaggregate all data to show any disparities by race / ethnicity, gender, age at  
time of alleged offense, and foster youth status. The County will publish a  
written, publicly available report each year sharing its analysis of this data.”

A copy of the Juvenile Court’s Order in this regard is attached hereto as Exhibit  
“G”. This Order became effective upon execution of the Order Granting  
Plaintiffs’ Motion for Final Approval of Class Action Settlement in the Federal  
Action.

8. Section XVI(A) of the Settlement Agreement is hereby revised to provide as  
follows:

1 A. Concurrently with their filing of this Agreement, Plaintiffs' Counsel shall  
2 apply to the Court for Preliminary Approval of the Settlement provided for in  
3 this Agreement and entry of a Preliminary Approval Order. Such Preliminary  
4 Approval will seek approval of a Notice to the Class, as well as a finding that  
5 the following satisfies the publication requirements of Rule 23 of the Federal  
6 Rules of Civil Procedure. The Parties agree that Defendants will contract with  
7 AB Data to create the Notice to the Class, and to create and implement the  
8 Notice Plan intended to reach a high percentage of Class Members. A copy of  
9 the Juvenile Court's Order authorizing the release to AB Data of the names and  
10 contact information for all youth who were referred to or have participated in  
11 the YAT Program is attached hereto as Exhibit "H". A description of the Notice  
12 Plan is attached as Exhibit D.

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(SIGNATURES ON FOLLOWING PAGE)



1 Accepted and Agreed to by:

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4  
5 Dated: August 20, 2020

6 By: /s/ Victor Leung

7 ACLU FOUNDATION OF SOUTHERN  
8 CALIFORNIA  
9 Victor Leung

10 ACLU FOUNDATION OF NORTHERN  
11 CALIFORNIA  
12 Linnea L. Nelson

13 AMERICAN CIVIL LIBERTIES UNION  
14 FOUNDATION  
15 Sarah Hinger (Admitted *Pro Hac Vice*)

16 ACLU FOUNDATION OF SAN DIEGO AND  
17 IMPERIAL COUNTIES  
18 David Loy  
19 Melissa Deleon

20 SHEPPARD, MULLIN, RICHTER  
21 & HAMPTON LLP  
22 Moe Keshavarzi  
23 Andrea N. Feathers

24 NATIONAL CENTER FOR YOUTH LAW  
25 Michael Harris

26 Attorneys for Plaintiffs

27  
28 August 20, 2020

By: 

23 OFFICE OF COUNTY COUNSEL FOR THE  
24 COUNTY OF RIVERSIDE  
25 James E. Brown  
26 Kelly A. Moran  
27 Attorneys for Defendants  
28

1 Pursuant to Local Rule 5-4.3.4(a)(2)(i), I, KELLY A. MORAN, attest that all  
2 signatories listed, and on whose behalf the filing is submitted, concur in the filing's  
3 content and have authorized the filing.

4 /s/ Kelly A. Moran  
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**EXHIBIT E**

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AND BRYCE HULSTROM  
12 *Additional counsel on following page*

13 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**  
14 **COUNTY OF RIVERSIDE - JUVENILE COURT**

15 SIGMA BETA XI, INC.; ANDREW  
16 M., by and through his next friend  
DENISE M., on behalf of himself and  
17 all others similarly situated; JACOB  
T., by and through his next friend  
18 HEATHER T., on behalf of himself  
and all others similarly situated; J.F.,  
19 by and through her next friend CINDY  
MCCONNELL, on behalf of herself  
20 and all others similarly situated,

21 Plaintiffs,

22 v.

23 COUNTY OF RIVERSIDE; MARK  
HAKE, Chief of the Riverside County  
24 Probation Department, in his official  
capacity; BRYCE HULSTROM, Chief  
25 Deputy of the Riverside County  
Probation Department, in his official  
26 capacity,

27 Defendants.  
28

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF RIVERSIDE

DEC 20 2019

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**[PROPOSED] ORDER OF THE  
JUVENILE COURT REGARDING  
APPOINTMENT AND PROVISION  
OF DEFENSE COUNSEL TO  
MINORS IN CONNECTION WITH  
THE YAT PROGRAM AND ALL  
NON-COURT-ORDERED  
SUPERVISION PROGRAMS**

Presiding Judge: Hon. Judith C. Clark

Case No. SWJ1900571

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Attorneys for Plaintiffs

1 **TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD HEREIN:**

2 Hearings on the Joint Stipulation and Petition filed by Plaintiffs Sigma Beta Xi,  
3 Inc., Jacob T., J.F., and Andrew M., and Defendants County of Riverside (the  
4 "County"), Mark Hake, and Bryce Hulstrom (together, the "Parties") took place  
5 before the Honorable Judith C. Clark, Superior Court Judge of Riverside County –  
6 Southwest Juvenile Court on October 21, 2019, November 6, 2019, and December 6,  
7 2019. After considering the papers filed by the Parties, oral argument, and the Order  
8 Granting Plaintiffs' Motion for Preliminary Approval of Class Action Lawsuit  
9 Settlement issued by the Honorable Jesus G. Bernal, United States District Judge of  
10 the Central District of California, in *Sigma Beta Xi, Inc. v. County of Riverside*, Case  
11 No. 5:18-cv-01399-JGB-JEM (the "Federal Action"), on August 26, 2019,

12 **IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** that:

13 Any youth involved in the Youth Accountability Team ("YAT") Program  
14 and/or any other non-court-ordered probation supervision program, who is within the  
15 jurisdiction of the juvenile court, shall be appointed counsel at no cost for purposes  
16 of the youth's involvement in the YAT Program and/or any other non-court-ordered  
17 probation supervision program only.

18 This Court further recognizes that, pursuant to agreement and stipulation by the  
19 Parties, at all times hereafter upon entry of this Order, all youths referred to and  
20 involved in a non-court-ordered probation supervision program operated by the  
21 County, including the YAT Program, must be provided counsel by the County, for  
22 purposes of the youth's involvement in the YAT Program and/or any other non-court-  
23 ordered probation supervision program only, at no cost to the youth from the time the  
24 youth is referred to the YAT Program or any other non-court-ordered probation  
25 supervision program through the time that all documents related to the youth's referral  
26 to and/or participation in the YAT Program or any other non-court-ordered probation  
27 supervision program are sealed and destroyed. The County has represented that it will  
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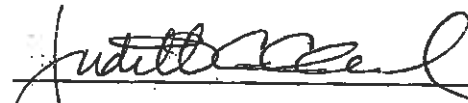


1 furnish such counsel through the Juvenile Defense Panel. Counsel thus appointed for  
2 the youth shall be provided access to all documents related to the youth's referral to  
3 and/or participation in the YAT Program or any other non-court-ordered probation  
4 supervision program, as necessary to represent the youth.

5 This Order shall become effective upon execution of the Order Granting  
6 Plaintiffs' Motion for Final Approval of Class Action Settlement in the Federal  
7 Action.

8 IT IS SO ORDERED.

9  
10  
11 Dated: Dec. 13, 2019

  
12 HON. JUDITH C. CLARK  
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# EXHIBIT F

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19 AND BRYCE HULSTROM  
20 *Additional counsel on following page*

21 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**  
22 **COUNTY OF RIVERSIDE - JUVENILE COURT**

23 SIGMA BETA XI, INC.; ANDREW  
24 M., by and through his next friend  
25 DENISE M., on behalf of himself and  
26 all others similarly situated; JACOB  
27 T., by and through his next friend  
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and all others similarly situated; J.F.,  
by and through her next friend CINDY  
MCCONNELL, on behalf of herself  
and all others similarly situated,

Plaintiffs,

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Deputy of the Riverside County  
Probation Department, in his official  
capacity,

Defendants.

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF RIVERSIDE

DEC 20 2019

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**[PROPOSED] ORDER OF THE  
JUVENILE COURT REGARDING  
SEALING OF YAT PROGRAM CASE  
FILES UNDER WELFARE &  
INSTITUTIONS CODE § 786.5**

Presiding Judge: Hon. Judith C. Clark

Case No. SWJ1900571

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5 before the Honorable Judith C. Clark, Superior Court Judge of Riverside County –  
6 Southwest Juvenile Court on October 21, 2019, November 6, 2019 and December 6,  
7 2019. After considering the papers filed by the Parties, oral arguments, and the Order  
8 Granting Plaintiffs' Motion for Preliminary Approval of Class Action Settlement  
9 issued by the Honorable Jesus G. Bernal, United States District Judge of the Central  
10 District of California, in *Sigma Beta Xi, Inc. v. County of Riverside*, Case No. 5:18-  
11 cv-01399-JGB-JEM (the "Federal Action"), on August 26, 2019,

12 **IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that:**

13 For the 23,717 youth the Riverside County Probation Department has deemed  
14 to have "successfully completed" the Youth Accountability Team ("YAT") Program,  
15 pursuant to Welfare & Institutions Code § 786.5, the Riverside County Probation  
16 Department shall seal the YAT Program case file records in its custody relating to all  
17 of the 23,717 youth referred to, and/or who participated in, the YAT Program.

18 The Riverside County Probation Department shall also notify all public or  
19 private agencies involved in operating the YAT Program to seal the YAT Program  
20 case file records in the custody of those agencies relating to all of the 23,717 youth's  
21 referral and participation in the YAT Program in accordance with Welfare &  
22 Institutions Code § 786.5. These agencies shall promptly seal all such records in  
23 accordance thereto.

24 Pursuant to Welfare & Institutions Code § 786.5, upon such sealing of any  
25 records of these 23,717 youth, the arrest or offense giving rise to the youth's  
26 participation in the program shall be deemed not to have occurred and the youth may  
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1 respond accordingly to any inquiry, application, or process in which disclosure of this  
2 information is requested or sought.

3 This Order shall become effective upon execution of the Order Granting  
4 Plaintiffs' Motion for Final Approval of Class Action Settlement in the Federal  
5 Action.

6 IT IS SO ORDERED.

7  
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9  
10 Dated: Dec. 13, 2019

  
HON. JUDITH C. CLARK



# EXHIBIT G

1 SYLVIA TORRES-GUILLÉN (SBN 164835)  
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18 Attorneys for Defendants, COUNTY OF RIVERSIDE; MARK HAKE,  
19 AND BRYCE HULSTRÖM  
20 *Additional counsel on following page*

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**SUPERIOR COURT FOR THE STATE OF CALIFORNIA**  
**COUNTY OF RIVERSIDE - JUVENILE COURT**

29 SIGMA BETA XI, INC.; ANDREW  
30 M., by and through his next friend  
31 DENISE M., on behalf of himself and  
32 all others similarly situated; JACOB  
33 T., by and through his next friend  
34 HEATHER T., on behalf of himself  
35 and all others similarly situated; J.F.,  
36 by and through her next friend CINDY  
37 MCCONNELL, on behalf of herself  
38 and all others similarly situated,

39 Plaintiffs,

40 v.

41 COUNTY OF RIVERSIDE; MARK  
42 HAKE, Chief of the Riverside County  
43 Probation Department, in his official  
44 capacity; BRYCE HULSTRÖM, Chief  
45 Deputy of the Riverside County  
46 Probation Department, in his official  
47 capacity,

48 Defendants.

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF RIVERSIDE

DEC 20 2019

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**[PROPOSED] ORDER OF THE  
JUVENILE COURT AUTHORIZING  
ACCESS TO YOUTH  
ACCOUNTABILITY TEAM  
JUVENILE CASE FILES BY  
MONITORS TO ENSURE THE  
COUNTY'S COMPLIANCE WITH  
THE TERMS OF THE SETTLEMENT  
AGREEMENT IN THE FEDERAL  
ACTION.**

Presiding Judge: Hon. Judith C.  
Clark

Case No. SWJ1900571

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Attorneys for Plaintiffs

1 **TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD HEREIN:**

2 Hearings on the Joint Stipulation and Petition filed by Plaintiffs Sigma Beta Xi,  
3 Inc., Jacob T., J.F., and Andrew M., and Defendants County of Riverside (the  
4 "County"), Mark Hake, and Bryce Hulstrom (together, the "Parties") took place  
5 before the Honorable Judith C. Clark, Superior Court Judge of Riverside County –  
6 Southwest Juvenile Court on October 21, 2019, November 6, 2019, and December 6,  
7 2019. After considering the papers filed by the Parties, oral argument, and the Order  
8 Granting Plaintiffs' Motion for Preliminary Approval of Class Action Settlement  
9 issued by the Honorable Jesus G. Bernal, United States District Judge of the Central  
10 District of California, in *Sigma Beta Xi, Inc. v. County of Riverside*, Case No. 5:18-  
11 cv-01399-JGB-JEM (the "Federal Action") on August 26, 2019,

12 **IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that:**

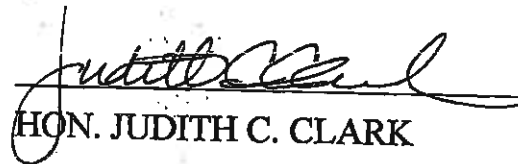
13 In accordance with Section XIV of the Parties' Settlement Agreement, the  
14 third-party Monitors stipulated to by the Parties shall be permitted access to the Youth  
15 Accountability Team ("YAT") Program case files for all youth in the YAT Program  
16 or any other non-court-ordered probation supervision program to ensure Defendants'  
17 compliance with the Agreement, subject to the following conditions: 1) any reports  
18 prepared by the third-party Monitors shall not include any of the juveniles' names or  
19 personally identifying information; 2) any reports prepared by the third-party  
20 Monitors shall not include any individual YAT case file, or part thereof, as an  
21 attachment, addendum or exhibit to the report, and 3) the Parties shall use the  
22 following notice which currently exists in the Notice to the Class in the Federal  
23 Action, provided to this Court, which advises Class Members that, "The County will  
24 regularly collect and analyze data around the referrals, participation, and outcomes  
25 for youth who are placed in the YAT program. The County will disaggregate all data  
26 to show any disparities by race / ethnicity, gender, age at time of alleged offense, and  
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1 foster youth status. The County will publish a written, publicly available report each  
2 year sharing its analysis of this data.”

3 This Order shall become effective upon execution of the Order Granting  
4 Plaintiffs’ Motion for Final Approval of Class Action Settlement in the Federal  
5 Action.

6 IT IS SO ORDERED.

7  
8  
9 Dated: Dec. 13, 2019

  
HON. JUDITH C. CLARK

**EXHIBIT H**



1 SYLVIA TORRES-GUILLÉN (SBN 164835)  
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18 Attorneys for Defendants, COUNTY OF RIVERSIDE; MARK HAKE,  
19 AND BRYCE HULSTROM

20 *Additional counsel on following page*

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**SUPERIOR COURT FOR THE STATE OF CALIFORNIA**  
**COUNTY OF RIVERSIDE - JUVENILE COURT**

29 SIGMA BETA XI, INC.; ANDREW  
30 M., by and through his next friend  
31 DENISE M., on behalf of himself and  
32 all others similarly situated; JACOB  
33 T., by and through his next friend  
34 HEATHER T., on behalf of himself  
35 and all others similarly situated; J.F.,  
36 by and through her next friend CINDY  
37 MCCONNELL, on behalf of herself  
38 and all others similarly situated,

39 Plaintiffs,

40 v.

41 COUNTY OF RIVERSIDE; MARK  
42 HAKE, Chief of the Riverside County  
43 Probation Department, in his official  
44 capacity; BRYCE HULSTROM, Chief  
45 Deputy of the Riverside County  
46 Probation Department, in his official  
47 capacity,

48 Defendants.

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF RIVERSIDE

DEC 20 2019

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DEC 20 2019

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**[PROPOSED] ORDER OF THE  
JUVENILE COURT AUTHORIZING  
ACCESS TO JUVENILE NAMES AND  
CONTACT INFORMATION BY AB  
DATA TO PROVIDE NOTICE OF  
THE CLASS SETTLEMENT  
AGREEMENT IN THE FEDERAL  
ACTION**

Presiding Judge: Hon. Judith C.  
Clark

Case No. SWJ1900571

1 LINNEA L. NELSON (SBN 278960)  
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Attorneys for Plaintiffs

1 **TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD HEREIN:**


2 Hearings on the Joint Stipulation and Petition filed by Plaintiffs Sigma Beta Xi,  
3 Inc., Jacob T., J.F., and Andrew M., and Defendants County of Riverside (the  
4 "County"), Mark Hake and Bryce Hulstrom (together, the "Parties") took place before  
5 the Honorable Judith C. Clark, Superior Court Judge of Riverside County – Southwest  
6 Juvenile Court on October 21, 2019, November 6, 2019, and December 6, 2019. After  
7 considering the papers filed jointly by the Parties, oral argument, and the Order  
8 Granting Plaintiffs' Motion for Preliminary Approval of Class Action Settlement  
9 issued by the Honorable Jesus G. Bernal, United States District Judge of the Central  
10 District of California, in *Sigma Beta Xi, Inc. v. County of Riverside*, Case No. 5:18-  
11 cv-01399-JGB-JEM (the "Federal Action") on August 26, 2019,

12 **IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that:**

13 In accordance with Section XVI of the Parties' Settlement Agreement, AB Data  
14 shall be permitted access to the names and contact information for all youth who were  
15 referred to or have participated in the YAT Program to provide notice of the  
16 settlement to Class Members, subject to the following conditions: 1) the names and  
17 contact information for the aforementioned youth may only be used for the limited  
18 purpose of providing notice of the settlement to the class members in the Federal  
19 Action; 2) the information cannot be provided by AB Data to any other entity except  
20 as necessary to effectuate mailing the notice to the class members in the Federal  
21 Action, e.g., AB Data may indirectly share the information with the United States  
22 Postal Service to effectuate delivery of the notice to the class members; and 3) the  
23 information cannot be sold, shared, or disseminated in any other way by AB Data.

24 **IT IS SO ORDERED.**

25  
26 Dated: Dec. 13, 2019

27   
28 HON. JUDITH C. CLARK

**PROOF OF SERVICE**

**United States District Court Case No. 5:18-cv-01399**

I, the undersigned, say that I am a citizen of the United States and am employed in the county of Riverside, over the age of 18 years and not a party to the within action or proceeding; that my business address is: 3960 Orange Street, Suite 500, Riverside, CA 92501-3611.

On August 24, 2020, a true and correct copy of the foregoing document entitled:

**ADDENDUM TO CLASS ACTION SETTLEMENT AGREEMENT**

was served on all parties pursuant to FRCivP 5(b) as follows:

SEE ATTACHED – SERVICE LIST

☒ TO BE SERVED BY THE COURT VIA THE NOTICE OF ELECTRONIC FILING (NEF). Pursuant to L.R. 5-3.2.3, the foregoing document will be served by the court via NEF and hyperlink to the document. I checked the CM/ECF docket for this case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the addresses stated.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on August 24, 2020, at Riverside, California.



Michelle Quiroz

SERVICE LIST

<p>Sylvia Torres-Guillén  <u>storres-guillen@aclusocal.org</u>  Hannah Comstock  <u>hcomstock@aclusocal.org</u>  American Civil Liberties Union  Foundation of Southern California, Inc.  1313 W. 8<sup>th</sup> Street  Los Angeles, CA 90017  T: (213) 977-5220  F: (213) 977-5299  Attorneys for Plaintiff</p>	<p>Christine P. Sun  <u>csun@aclunc.org</u>  Linnea L. Nelson  <u>lnelson@aclunc.org</u>  American Civil Liberties Union  Foundation of Northern California,  Inc.  39 Drumm St.  San Francisco, CA 94111  T: (415) 621-2493</p>
<p>Sheppard Mullin Richter &amp; Hampton  Moe Keshavarzi  <u>mkesavarzi@sheppardmullin.com</u>  Andrea N. Feathers  <u>afeathers@sheppardmullin</u>  333 South Hope Street, 43<sup>rd</sup> Floor  Los Angeles, CA 90071-1422  T: (213) 620-1780  F: (213) 620-1398</p>	<p>Sarah Hinger  <u>shinger@aclu.org</u>  American Civil Liberties Union  Foundation  125 Broad Street, 18<sup>th</sup> Floor  New York, NY 10004  T: (212) 519-7882</p>
<p>MICHAEL HARRIS  <u>mharris@youthlaw.org</u>  NATIONAL CENTER FOR  YOUTH LAW  405 14th Street, 15th Floor  Oakland, CA 94612  Telephone: (510) 835-8098  Facsimile: (410) 835-8099</p>	<p>DAVID LOY  <u>davidloy@aclusandiego.org</u>  MELISSA DELEON  <u>mdeleon@aclusandiego.org</u>  AMERICAN CIVIL LIBERTIES  UNION FOUNDATION OF SAN  DIEGO AND IMPERIAL COUNTIES  P.O. Box 87131  San Diego, CA 92138-7131  Telephone: (619) 398-4489  Facsimile: (619) 232-0036</p>
<p>VICTOR LEUNG  <u>vleung@aclusocal.org</u>  ALEXIS PIAZZA  <u>apiazza@aclusocal.org</u>  AMERICAN CIVIL LIBERTIES  UNION FOUNDATION OF  SOUTHERN CALIFORNIA, INC.  1313 W. 8th Street  Los Angeles, CA 90017  Telephone: (213) 977-5219  Facsimile: (213) 977-5299</p>	